## EXHIBIT "A"

## LAW OFFICES

## **GUZZARDO & ASSOCIATES LLC**

Joseph Guzzardo, Esq. iguzzardo@guzzardolaw.com Licensed in Pennsylvania and New Jersey Pa. Id. No.95089 N.J. Id. 045892004

121 S. Broad Street **Suite 1600** Philadelphia, PA 19107 Telephone (215) 718-6691 http://www.guzzardolaw.com

New Jersey Office 20 Brace Rd. Suite 350 Cherry Hill New Jersey 08034

January 20, 2021

Via E-Filing

The Honorable Ann Marie Donio, USMJ Mitchell H. Cohen Building 4th and Cooper Streets Camden, NJ 08101

Evangelista et. al. v. The Housing Authority of the City of Camden et. al. Re:

No. 20-16824

Dear Judge Donio,

Please accept Plaintiffs' portion of the joint status report that the court recently directed Plaintiff to file. Kindly also accept Plaintiff's apology for failing to appear at the prior phone conference. The undersigned Plaintiff's counsel is a solo practitioner experiencing fast growth. Accordingly, the undersigned has recently entered into a partnership agreement with the law firm of Goldberg Miller & Rubin to increase working capacity. There was miscommunication regarding the allocation of work on several files. Mathew Maroney, Esq. has recently entered his appearance on behalf of Plaintiffs in the instant matter and this will hopefully avoid any further issues.

With respect to outstanding discovery, Defendants have been provided with Plaintiff, Gary Evangelista's Answers to Interrogatories. The undersigned is in possession of a portion of Plaintiff, Kabiria Fussel's answers to interrogatories; however, there she has failed to provide some information that is needed to finalize her answers. As to documents, it is important to note that as Plaintiffs' employer, Defendants are in possession of the lion's share of relevant documentation. Plaintiff has produced the discoverable documents in his possession as of this filing except for a large transcript of Plaintiff, Kabira Fussel's grievance before the Public Employment Relations Commission. The undersigned will have to mail this document to Defendants although it is likely already in their possession.

Respectfully submitted,

BY: /s/Joseph P. Guzzardo, Esq. Joseph P. Guzzardo, Esquire Attorney for Plaintiffs